



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MAR 11 2016

**CERTIFIED MAIL #7009 1680 0000 7677 8206**  
**RETURN RECEIPT REQUESTED**

Mr. Charles Webber  
Manager  
Environmental Affairs  
Chicago Transit Authority  
567 West Lake Street, 9<sup>th</sup> Floor  
Chicago, Illinois 60661

Re: Notice of Violation  
RCRA Compliance Evaluation Inspection – Chicago Transit Authority  
EPA ID No.: ILD 984 774 117

Dear Mr. Webber:

On February 17, 2016 a representative of the U.S. Environmental Protection Agency inspected the Chicago Transit Authority (CTA) facility, located in Forest Park, Illinois. As a large quantity generator of hazardous waste, CTA is subject to the Resource Conservation and Recovery Act (RCRA); 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate CTA's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by CTA, EPA's review of records pertaining to CTA, and the inspector's observations, EPA has determined that CTA has unlawfully stored hazardous waste without a permit or interim status as a result of CTA's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c) [40 CFR 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which CTA was out of compliance at the time of the inspection in paragraphs 1 through 3, below.

Many of the conditions for the RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or

dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirements. The exemption conditions identified in paragraphs 1- 3 are also independent TSD requirement incorporated from Ill. Admin. Code tit. 35 Part 725. Accordingly, each failure of CTA to comply with these conditions is also a violation of the corresponding requirement in Ill. Admin. Code tit. 35 Part 724 [40 CFR Part 264] (if the facility should have been permitted).

#### STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

At the time of the inspection, CTA was out of compliance with the following large quantity generator permit exemption conditions:

The permit exemption conditions identified below in paragraphs 1 through 3, are independent TSD requirements violated by CTA.

#### Training

1. A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. See Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(a) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)]. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. See Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(b) and (c) [40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c)].

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

- 1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- 2) A written job description for each position at the facility related to hazardous waste management;



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#### STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

At the time of the inspection, CTA was out of compliance with the following large quantity generator permit exemption conditions:

The permit exemption conditions identified below in paragraphs 1 through 3, are independent TSD requirements violated by CTA.

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With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

- 1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- 2) A written job description for each position at the facility related to hazardous waste management;

3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and

4) Records that document that the training or job experience described above has been given to and completed by facility personnel. See Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(d) [40 C.F.R. §§ 262.34(a)(4) and 265.16(d)].

At the time of the inspection, CTA was unable to provide the job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;

At the time of the inspection, CTA, was unable to provide a written job description for each position at the facility related to hazardous waste management;

At the time of the inspection, CTA was unable to provide a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and

At the time of the inspection, CTA was unable to provide records that document that the training or job experience described above has been given to and completed by facility personnel.

#### Contingency Plan

2. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must submit a copy of its contingency plan and revisions to the plan to the local police department, fire department, hospital and state and local emergency response teams that may be called upon to provide emergency services. See Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.153(b) [40 C.F.R. §§ 262.34(a)(4) and 265.53(b)].

At the time of the inspection, CTA had not submitted a copy of the facility contingency plan (emergency response and spill control plan) to the local hospital, police and fire departments that may be called upon to provide emergency services.

3. In order to avoid the need for a hazardous waste storage permit, a large quantity generator's written contingency plan must include, among other things, the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. See Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.152 (d) [40 CFR §§ 262.34(a)(4) and 265.52(d)].



At the time of the inspection, CTAs' contingency plan did not designate a person as the primary and alternate emergency coordinators nor did it include the primary or alternate coordinator's home addresses, and phone numbers (office and home).

**Summary:** By failing to comply with the conditions for a permit exemption, above, CTA became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. CTA failed to apply for such a permit. CTA's failure to apply for and obtain a hazardous waste storage permit violated Ill. Admin. Code tit. 35 §§703.121(a) and (b); 703.180(c); and 705.121(a) [40 CFR §§ 270.1(c), and 270.10(a) and (d)].

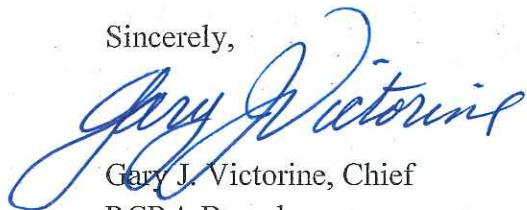
After the inspection, as documented in a February 24, 2016 email to EPA, you took certain actions to establish compliance with violation numbers 2 and 3.

According to Section 3008(a) of the RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order, or a request for information under Section 3007 of RCRA, 42 U.S.C. CFR § 6927, we request that you submit a response in writing to us no later than thirty (30) days after receipt of this letter documenting the actions, if any, you have taken related to violation 1.

You should submit your response to Sheila Burrus, U.S. Environmental Protection Agency, Region 5, 77 W. Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Sheila Burrus, of my staff, at (312) 886-3587.

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois EPA ([todd.marvel@illinois.gov](mailto:todd.marvel@illinois.gov))

3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and

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#### Contingency Plan

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At the time of the inspection, CTAs' contingency plan did not designate a person as the primary and alternate emergency coordinators nor did it include the primary or alternate coordinator's home addresses, and phone numbers (office and home).

**Summary:** By failing to comply with the conditions for a permit exemption, above, CTA became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. CTA failed to apply for such a permit. CTA's failure to apply for and obtain a hazardous waste storage permit violated Ill. Admin. Code tit. 35 §§703.121(a) and (b); 703.180(c); and 705.121(a) [40 CFR §§ 270.1(c), and 270.10(a) and (d)].

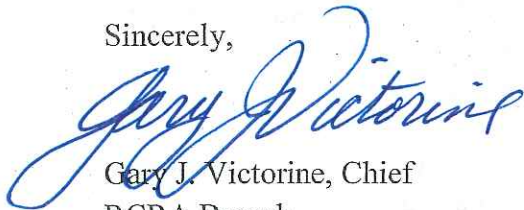
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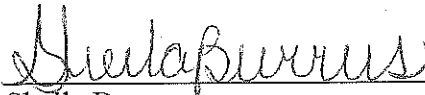


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

**INSTALLATION NAME:** Chicago Transit Authority  
**U.S. EPA ID. No.:** ILD 984 774 117  
**LOCATION ADDRESS:** 711 S. Des Plaines Avenue  
Forest Park, Illinois 60130  
**DATE OF INSPECTION:** February 17, 2016  
**U.S. EPA INSPECTORS:** Sheila Burrus, RCRA Hazardous Waste

**PREPARED BY:**

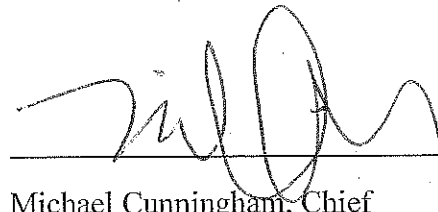
  
\_\_\_\_\_  
Sheila Burrus

Environmental Protection Specialist

2/24/16

Date: \_\_\_\_\_

**APPROVED BY:**

  
\_\_\_\_\_  
Michael Cunningham, Chief

Compliance Section 1.  
RCRA Branch  
Land and Chemicals Division

2/29/16

Date: \_\_\_\_\_

### **Purpose of Inspection**

The purpose of the inspection was to conduct an unannounced compliance evaluation inspection (CEI) at Chicago Transit Authority (CTA) located at 711 S. Des Plaines Avenue, Forest Park, Illinois, to evaluate CTA's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the management of hazardous and universal waste and used oil.

**Participants:** Charles Webber, Thomas Dietrich and Edward Wilson represented CTA. Sheila Burrus represented EPA Region 5.

### **Installation Description/Background**

Chicago Transit Authority site consists of a two story rail car maintenance facility. A passenger rail station is located to the north of the facility. The remaining portion of the facility consists of a railcar storage yard, substation and switch house.

U.S. EPA or the Illinois Environmental Protection Agency has never conducted a hazardous waste inspection at this CTA location.

A review of hazardous waste manifests and waste volume on-site indicates that CTA had been operating as a large quantity generator in the years 2012 and 2013, a conditionally exempt small quantity in the year 2014 and a small quantity generator in the year 2015.

### **Waste Generation**

CTA currently generates its hazardous waste from expired products (raw materials).

CTA generates used oil from maintenance (railcars) operations.

CTA generates waste lamps from maintenance of its rail cars. The facility has a florescent waste lamp crusher. The facility is in the process of replacing all of its fluorescent lamps in its rail cars with LED's.

### **Opening Conference**

I arrived at CTA at 8:30 a.m. on February 17, 2016. I introduced myself and presented my enforcement credentials to Edward Wilson and explained that I was there to conduct a compliance evaluation inspection that included a visual site inspection and records review. I then proceeded to conduct the opening conference by explaining what specific records I would need to review.

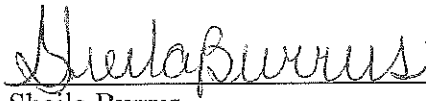
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PREPARED BY:

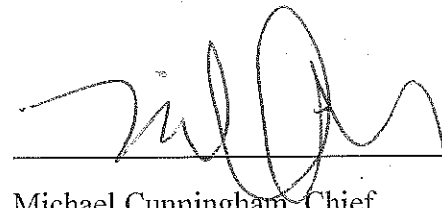


Sheila Burrus  
Environmental Protection Specialist

2/24/16

Date:

APPROVED BY:



Michael Cunningham, Chief  
Compliance Section 1  
RCRA Branch  
Land and Chemicals Division

2/29/16

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I asked for a brief description of the type of work done at this installation and types of wastes generated. Mr. Webber began to provide background and waste stream information about CTA which is included above in the installation description/background section of this report.

I provided a Small Business Resource Information Sheet, the U.S. EPA – Region 5 Pollution Prevention State Contact list, Illinois Waste Management Research Sustainable Solutions Brochure and the U.S. EPA Managing Used Oil Advice for Small Business brochure to Mr. Webber.

I continued the opening conference by asking who picks up CTA's hazardous waste. Mr. Webber indicated that Veolia ES Technical Solutions picks up its hazardous waste and transport it to its facility located in Menomonee Falls, Wisconsin for disposal. Safety Kleen Systems, Inc. located in Dolton, Illinois picks up its crushed waste lamps, used oil and non-hazardous waste parts washer solvent.

I began the CEI by conducting the records review portion of the inspection.

### **Records Review**

I began the records review portion of the inspection with the assistance of Messrs. Webber, Dietrich and Wilson. I requested hazardous waste manifests, land disposal restriction forms, hazardous waste training records, biennial reports, contingency plan and weekly inspection logs for the hazardous waste storage.

My observations are categorized below:

### **Contingency plan**

CTA was unable to provide documentation showing that a copy of its emergency response and spill control plan had been sent to the local emergency authorities.

CTA's emergency response and spill control plan did not designate a person as the primary and alternate emergency coordinators nor include their home addresses and phone numbers.

### **Manifests**

I reviewed manifest records for the years 2013, 2014 and 2015 and found them to be complete.

### **Weekly Inspection Logs**

Mr. Webber stated that weekly inspections are performed, just not documented.



### Training Records/Job Descriptions

CTA was unable to provide documentation showing that facility personnel completed a hazardous waste training program within six months after the effective date of their employment or assignment and took part in an annual review of their initial training.

CTA was unable to provide for review job descriptions for its employees that handle and/or manage hazardous waste.

### Biennial Reports

I reviewed biennial reports for the years 2012 and 2014 and found them to be complete.

### Visual Site Inspection

I was accompanied by Messrs. Webber, Dietrich and Wilson during the VSI portion of the inspection. We proceeded to the oil storage room where I observed one labeled 900-gallon used oil storage tank (Photograph 1).

Next we proceeded to the waste lamp crusher which is located on the north side of the facility. I observed two unlabeled 55-gallon waste lamp crushers (one of the containers was empty (Photograph 2). Mr. Webber stated that it takes appropriately 1 year to fill a 55-gallon drum of crushed waste lamps.

After inspecting the waste lamp crusher we proceeded to the parts washer which generates non-hazardous waste mineral spirits from the cleaning of small parts (Photograph 3). The facility did not have any hazardous waste on-site at time of the inspection.

I observed fire extinguishers and eyewash stations throughout the facility.

### Closing Conference

In closing, a conference was held with Messrs. Webber, Dietrich and Wilson. I summarized where I had been taken during the RCRA portion of the VSI and what information presented to me. I thanked everyone for there cooperation and concluded the CEI at approximately 12:00 p.m.

### Attachment

Photographs 1 thru 4

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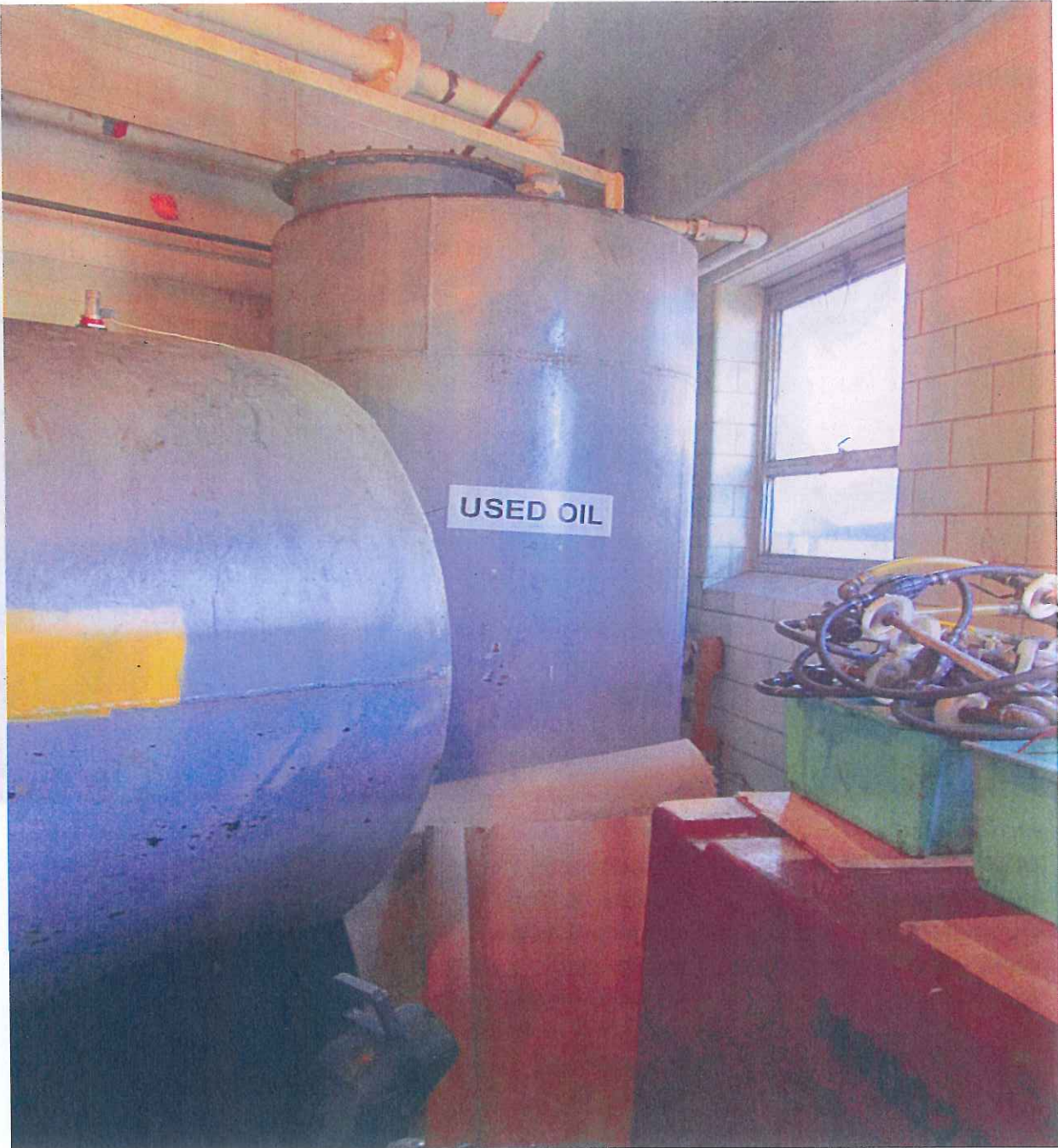
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Photographs 1 thru 4



PHOTOGRAPH: 1

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 17, 2016

LOCATION OF PHOTOGRAPH:

Oil Storage Room

SCENE BEING PHOTOGRAPHED:

900-gallon container of used oil

SITE LOCATION:

711 S. Des Plaines Avenue

Forest Park, IL 60130

INSTALLATION NAME:

Chicago Transit Authority

INSTALLATION I.D. #

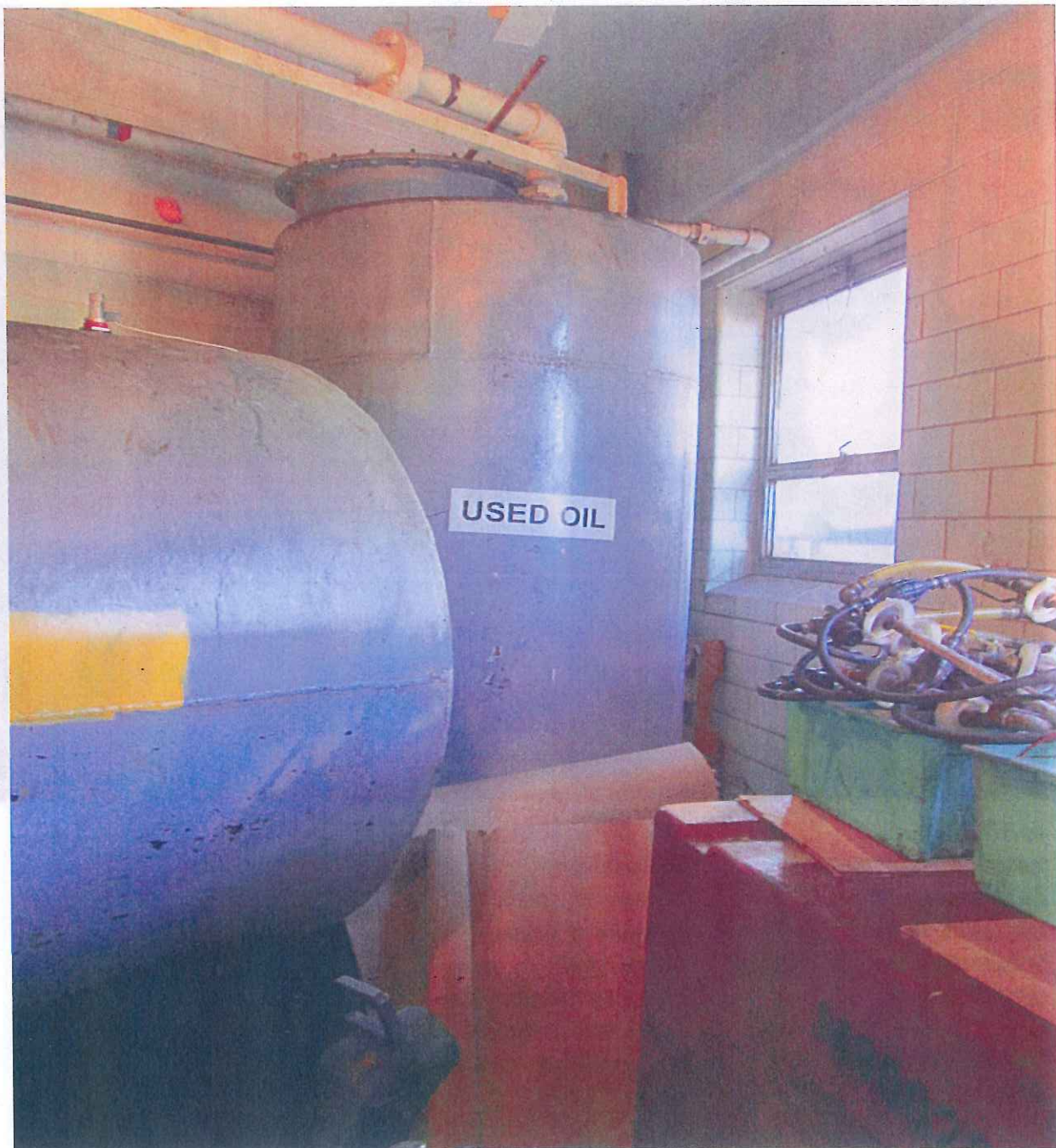
ILD 984 774 117





PHOTOGRAPH: 2  
NAME OF PHOTOGRAPHER: Sheila Burrus  
DATE OF PHOTOGRAPH: February 17, 2016  
LOCATION OF PHOTOGRAPH: northside of building  
SCENE BEING PHOTOGRAPHED: Bulb Crusher  
SITE LOCATION: 711 S. Des Plaines Avenue  
Forest Park, IL 60130  
INSTALLATION NAME: Chicago Transit Authority  
INSTALLATION I.D. #: ILD 984 774 117





**PHOTOGRAPH: 1**

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	February 17, 2016
LOCATION OF PHOTOGRAPH:	Oil Storage Room
SCENE BEING PHOTOGRAPHED:	900-gallon container of used oil
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INSTALLATION NAME:	Chicago Transit Authority
INSTALLATION I.D. #	ILD 984 774 117





PHOTOGRAPH: 2  
NAME OF PHOTOGRAPHER: Sheila Burrus  
DATE OF PHOTOGRAPH: February 17, 2016  
LOCATION OF PHOTOGRAPH: northside of building  
SCENE BEING PHOTOGRAPHED: Bulb Crusher  
SITE LOCATION: 711 S. Des Plaines Avenue  
Forest Park, IL 60130  
INSTALLATION NAME: Chicago Transit Authority  
INSTALLATION I.D. # ILD 984 774 117



PHOTOGRAPH: 3

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 17, 2016

SCENE BEING PHOTOGRAPHED:

Parts Washer

SITE LOCATION:

711 S. Des Plaines Avenue  
Forest Park, IL 60130

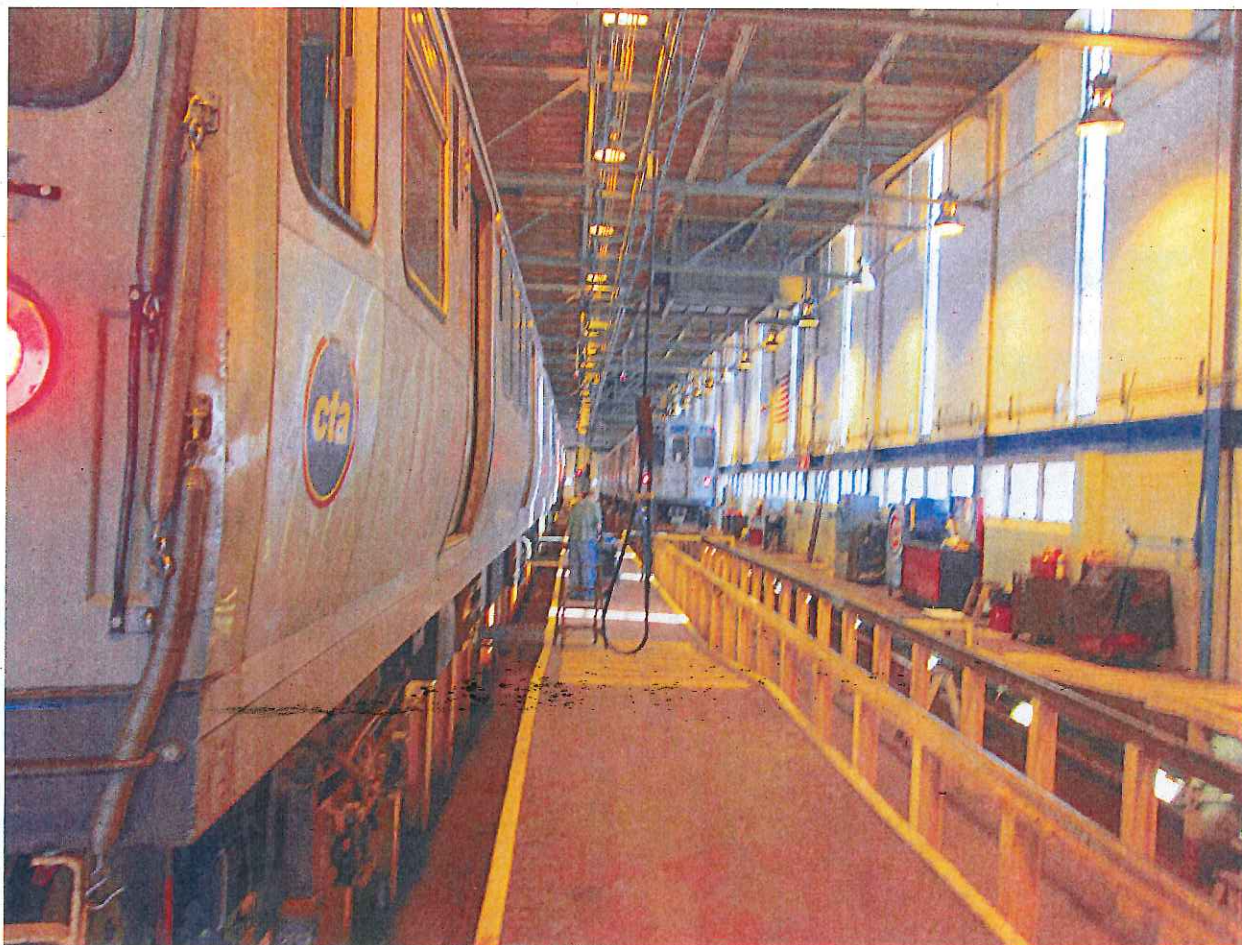
INSTALLATION NAME:

Chicago Transit Authority

INSTALLATION I.D. #

ILD 984 774 117





PHOTOGRAPH: 4  
NAME OF PHOTOGRAPHER: Sheila Burrus  
DATE OF PHOTOGRAPH: February 17, 2016  
SCENE BEING PHOTOGRAPHED: rail-car maintenance facility  
SITE LOCATION: 711 S. Des Plaines Avenue  
Forest Park, IL 60130  
INSTALLATION NAME: Chicago Transit Authority  
INSTALLATION I.D. # ILD 984 774 117



PHOTOGRAPH: 3

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 17, 2016

SCENE BEING PHOTOGRAPHED:

Parts Washer

SITE LOCATION:

711 S. Des Plaines Avenue  
Forest Park, IL 60130

INSTALLATION NAME:

Chicago Transit Authority

INSTALLATION I.D. #

ILD 984 774 117





PHOTOGRAPH: 4  
NAME OF PHOTOGRAPHER: Sheila Burrus  
DATE OF PHOTOGRAPH: February 17, 2016  
SCENE BEING PHOTOGRAPHED: rail-car maintenance facility  
SITE LOCATION: 711 S. Des Plaines Avenue  
Forest Park, IL 60130  
INSTALLATION NAME: Chicago Transit Authority  
INSTALLATION I.D. # ILD 984 774 117